

ORIGINAL

FILED IN CHAMBERS
U.S.D.C. Atlanta

AUG 24 2021

Kevin P. Werner, Clerk
By: *[Signature]*
Deputy Clerk

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA

v.

JAMAL HARRISON, AKA "JD"

Criminal Indictment

No. 1 :21 · C R 3 1 9

THE GRAND JURY CHARGES THAT:

COUNTS 1 THROUGH 6
(*Wire Fraud - 18 U.S.C. § 1343*)

1. Beginning on a date unknown to the Grand Jury, but from at least as early as July 2020, and continuing through on or about March 1, 2021, in the Northern District of Georgia, the defendant, JAMAL HARRISON, aka "JD," knowingly devised and intended to devise a scheme and artifice to defraud an individual identified herein as "Person 1," and to obtain money and property from Person 1 by means of materially false and fraudulent pretenses, representations, and promises, and by omissions of material fact, and in furtherance of the scheme did, with intent to defraud, cause to be transmitted by means of wire communications in interstate and foreign commerce, certain signs, signals, pictures, and sounds.

Background

At all times relevant to this Indictment:

2. Person 1 was a resident of the Northern District of Georgia and a criminal defendant in a federal case brought in the United States District Court for the

Northern District of Georgia, Atlanta Division (the “Federal Case”). Person 1 was arrested in the Federal Case in or about July 2020 and was subsequently released on bond pending trial.

3. Upon conviction for one or more of the crimes charged in the Federal Case, Person 1 was subject to a term of imprisonment, a term of supervised release, and other monetary fines and penalties.

4. Shortly after Person 1’s arrest and bond, HARRISON contacted and met with Person 1. During the meeting, Person 1 showed HARRISON a copy of the indictment in the Federal Case – a document that stated the charges against Person 1 and the name of a federal prosecutor.

Purpose of the Scheme to Defraud

5. The purpose of the scheme to defraud was for HARRISON, using the knowledge he obtained from reviewing the indictment in the Federal Case, to make materially false representations and promises to extort money from Person 1, and to conceal this scheme to defraud by promising Person 1 that the Federal Case would be dismissed at a later date because of the payments HARRISON extorted from Person 1.

Manner and Means

6. The manner and means by which HARRISON carried out the scheme included, but were not limited to, the following:

a. In or about August 2020, during a meeting between Person 1 and HARRISON in the Northern District of Georgia, HARRISON falsely asserted while meeting with Person 1 that he was an employee of

the Georgia Bureau of Investigation (“GBI”). HARRISON claimed that for \$15,000, he could arrange for the prosecutor in the Federal Case to dismiss one or more of the charges in the indictment. Person 1 refused.

- b. Days later, during another meeting between Person 1 and HARRISON in the Northern District of Georgia, HARRISON falsely stated that he had seen the evidence in the federal case, which he represented supported further criminal charges against Person 1. HARRISON threatened that unless Person 1 paid up, the prosecutor in the Federal Case would bring additional criminal charges and also seek a harsher prison sentence for Person 1 after any conviction. HARRISON stated that he was not going to keep the money himself, but instead would give it to the prosecutor in the Federal Case. Fearing the prospect of additional charges and imprisonment, Person 1 relented to HARRISON’s threat.
- c. Between in or about August and September 2020, the exact dates being unknown to the Grand Jury, Person 1 sent cash payments totaling approximately \$12,000 to HARRISON.
- d. Following the payments, HARRISON falsely asserted that he had given the money to the prosecutor in the Federal Case, which would soon be dismissed. HARRISON sometimes referred to the purported future dismissal of the Federal Case as “the big D.”

HARRISON also stated that if Person 1 was able to pay more money, it would assist the dismissal of the Federal Case.

- e. On or about February 22, 2021, Person 1 and HARRISON had a telephone call, during which HARRISON falsely stated that the prosecutor in the Federal Case had received Person 1's previous payments and was working toward dismissal of the Federal Case. Person 1 raised the prospect of an additional payment to HARRISON to ensure dismissal of the Federal Case, and HARRISON asked to meet Person 1 in person.
- f. On or about February 24, 2021, during a meeting between Person 1 and HARRISON in the Northern District of Georgia, Person 1 offered to give an additional \$3,000 to HARRISON. HARRISON falsely told Person 1, in sum and substance, that HARRISON would get the Federal Case dismissed.
- g. On or about March 1, 2021, during another meeting between Person 1 and HARRISON in the Northern District of Georgia, Person 1 gave HARRISON a \$3,000 payment. During this meeting, HARRISON falsely told Person 1, in sum and substance, that the prosecutor guaranteed dismissal of the Federal Case.

Execution of the Scheme

7. On or about the dates set forth below, in the Northern District of Georgia, the defendant, JAMAL HARRISON, aka "JD," for the purpose of executing and attempting to execute the scheme and artifice to defraud set forth above, knowingly caused to be transmitted by means of wire communications in interstate and foreign commerce, certain signs, signals, pictures, and sounds; that is, the text message transmissions listed below:

Count	Date	Description
1	Aug. 11, 2020	"I promise you I can help you get your old life back 100."
2	Aug. 13, 2020	"You can get walking papers for 15k. 10 to person in charge and 5 to paperwork person []. Your [sic] welcome . . ."
3	Sept. 2020	A photograph of GBI headquarters, and a message stating, "I gotta be in the judges chambers by noon 2pm at the latest."
4	Sept. 3, 2020	Text message of a photograph of an envelope full of cash, and stating, "Handing this off in a Hr."
5	Feb. 22, 2021	"Time is winding down and a SECURED yes on the big D is gonna wrap your case up."
6	Feb. 23, 2021	"Convo had & it's set in stone . . . enjoy your normal life again and wait on the big D."

All in violation of Title 18, United States Code, Sections 1343 and 1349 and Section 2.

FORFEITURE

8. Upon conviction of the offenses alleged in Counts One through Six, the defendant, JAMAL HARRISON, aka "JD," shall forfeit to the United States,

pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 982(a)(2), any property, real or personal, that constitutes or is derived from proceeds traceable to such offenses, including but not limited to the following:

- a. MONEY JUDGMENT: A sum of money in United States currency, representing the amount of proceeds obtained as a result of the offenses alleged in Indictment.
9. If any of the above-described forfeitable property, as a result of any act or omission of defendant HARRISON:
 - a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third party;
 - c. has been placed beyond the jurisdiction of the Court;
 - d. has been substantially diminished in value; or
 - e. has been commingled with other property which cannot be divided without difficulty;

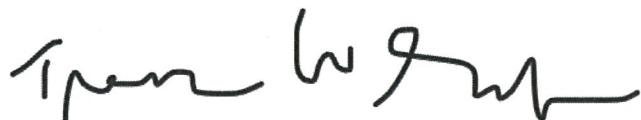
it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1)

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and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above.

A True BILL
rgs 8/24/21
FOREPERSON

KURT R. ERSKINE
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